

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED

Nov 5 4 30 PM '98

MAILING ONLINE SERVICE

Docket No. MC98-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS GARVEY TO INTERROGATORIES OF
PITNEY BOWES, INC.
(PB/USPS-T1-1-6)

The United States Postal Service hereby provides the responses of witness Garvey to the following interrogatories of Pitney Bowes, Inc.: PB/USPS-T1-1-6, filed on October 26, 1998.


Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

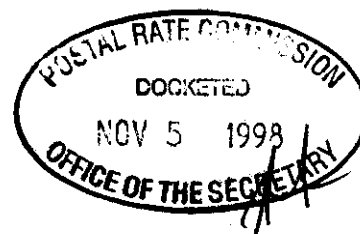
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3083; Fax -5402
November 5, 1998



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF PITNEY BOWES INC.**

PB/USPS-T1-1. You testified at USPS-T1, 10, line 10, that payment for Mailing Online services by credit card will be permitted.

- a. What process or processes will be employed to verify credit card information?
- b. Will there be any limit imposed by the Postal Service, as opposed to the credit card issuing institution, on the amount that can be charged to a card for any given transaction or within any pre-established period of time?
- c. What will be the cost be to the Postal Service per dollar of MOL payments received by credit card?
- d. Identify all studies conducted by or for the Postal Service regarding the use of credit cards to pay fees for the use of Mailing Online and provide (or make available as library references) those studies.

RESPONSE:

- a. PostOffice Online (POL) requires the customer to enter credit card information each time service is purchased. The customer is required to submit both the credit card number and billing address of record as it is documented with the card issuer.
- b. No.
- c. This information is commercially sensitive and its release, other than pursuant to a court order regarding obligations under the Freedom of Information Act, or to a Congressional committee exercising its oversight or investigatory jurisdictions, would violate contractual provisions. However, I understand the Postal Service stands in the same shoes as any other vendor who accepts credit card payments and thus pays a very small percentage of each charge to the credit card companies.
- d. No such studies exist.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
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PB/USPS-T1-2. You testified, at USPS-T1, 11, lines 10-12 that one of the goals of Mailing Online is "to reduce the aggregate cost of producing and entering a small mailing and provide a lower cost and more efficient way to use the mail."

- a. Is it your understanding that the printers with which the Postal Service will contract to produce MOL mailpieces will be required to use the permit imprint method for evidencing the payment of postage?
- b. If so, was consideration given to the fact that postage meters are generally considered to be more cost efficient ways of providing evidence of payment of postage than the permit imprint methodology?
- c. Do you know of any reason that the use of postage meters to show the postage of payment on MOL mailpieces is inconsistent with the general operation of the MOL program?

RESPONSE:

- a. The use of a permit imprint is currently the only method planned for evidencing postage payment on Mailing Online mailpieces. The current printer's contract specifies a requirement to supply envelopes printed with a USPS specified MOL permit imprint indicia and to insert all MOL mailpieces into those envelopes. This specification will be placed in future contracts as well.
- b. Consideration was given to all available methods of postage payment. I am not personally aware of any factual evidence or even a general opinion regarding the superiority of postage meters for evidencing postage payment. Each method has inherent advantages and disadvantages in specific situations and in this situation, permit imprint methodology is the best and most appropriate.
- c. In Mailing Online, postage collection and payment is designed to operate as a "just-in-time" system. Postage payment funds collected from MOL

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customers at the completion of their transaction sessions are transferred daily to a standard Computerized Accounts Processing System (CAPS) account. Mailing Online permit imprint accounts (currently only one active account exists, in Waltham, Massachusetts) will be linked to that single MOL CAPS account at the time they are established. This procedure is standard practice for mailers with permit imprint accounts in several different locations, and has the unique attribute of facilitating the funding of multiple accounts through a single deposit. Deposited postage funds are immediately available for payment of MOL mailings through established links of CAPS to the USPS Permit system at major Business Mail Entry Units. Since the ultimate design of MOL calls for the electronic distribution of all documents to multiple distributed sites, postage for a given mailing must be available no later than the next day and at any location to which mailpieces from that mailing might be distributed. These requirements make usage of postage meters difficult if not impossible for MOL; even if such usage were possible, it would add considerable cost and complexity.

In addition, the overall Mailing Online system design is predicated on automating as much of the mailing process as possible at a system level. Ultimately, a manifesting system will be integrated into MOL which will allow the co-mingling of variable weights in the same batch. Postage will be determined and recorded by the system and then documented in a

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manifest. Unique piece identifiers will be applied to each envelope during the printing process and will be available to verify manifest reports and postage statements. In this environment, a postage meter's capabilities are eclipsed and rendered obsolete.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF PITNEY BOWES INC.**

PB/USPS-T1-3. In response to OCA/USPS-T5-14-i, you testified (at least implicitly) that the Form 3600 was the only document to be supplied to the Postal Service on entry of First Class MOL mail at a postal facility.

- a. Is there any plan for additional or different documentation for First Class Mail entered during the experiment if it is approved?
- b. What is your understanding as to documentation that will be supplied to the entry Postal facility on the entry of Standard (A) mail?
- c. Please provide examples of any documents (other than the Form 3600) referred to in your answers above.

RESPONSE:

- a. The Form 3600 will continue to be the primary documentation. As included in Exhibit 1 to OCA/USPS-T5-14, a Coding Accuracy Support System (CASS) Report will also be included with Form 3600 during the experiment. For the experiment, it is also possible that a USPS Qualification Report will be produced and supplied to the Bulk Mail Entry Unit. Upon the development and approval of a manifesting capability for MOL, additional documentation will be supplied. It is expected that this documentation will be consistent with existing requirements for manifesting documentation.
- b. Standard (A) Mail will be submitted with a Form 3602, a CASS Report and a USPS Qualification Report or manifesting documentation.
- c. Attached are:

Exhibit 1 - sample Form 3602.
Exhibit 2 - sample CASS Report.
Exhibit 3 - sample USPS Qualification Report

Since the system design is not final, no specific examples are available of an MOL manifesting report.

Postage Statement — Standard Mail (A)
(Other Than Nonprofit) — Permit Imprint
MAILER: Complete all items by typewriter, pen, or indelible pencil. If you need a receipt, prepare in duplicate.

| | | | | | | | | |
|---|---|--------------------------|--|--|--|------------------------|--|----|
| Mailer Information | Post Office of Mailing | | Mailing Date | | Processing Category <input type="checkbox"/> Letters (DMM C050) <input type="checkbox"/> Flats (DMM C050) <input type="checkbox"/> Automation Flats (DMM C820) <input type="checkbox"/> Machinable Parcels (DMM C050) <input type="checkbox"/> Irregular Parcels (DMM C050) | | USPS Authorized Mailing ID Code(s) | |
| | Permit No. | Federal Agency Cost Code | Statement Sequence No. | | | | | |
| | Permit Holder's Name and Address (Include ZIP Code) | | Telephone | | Receipt No. | | Prepared Under DMM (Check all that apply) <input type="checkbox"/> M610 (Letters, flats, parcels) <input type="checkbox"/> M610 (Upgradable letters) <input type="checkbox"/> M620 (Enhanced Carrier Route) <input type="checkbox"/> M810 (Automation letters) <input type="checkbox"/> M820 (Automation flats) | |
| | | | Number of Containers (Fill in all that apply) 1-Ft. MM Trays _____ 2-Ft. MM Trays _____ 2-Ft. EMM Trays _____ Total Ltr. Trays _____ Flat Trays <u>N/A</u> Sacks _____ Pallets _____ Other _____ | | | | | |
| | Customer No. _____ (Dun & Bradstreet) CTAS Cust. Ref. ID _____ | | Weight of a Single Piece _____ pounds | | Total Pieces _____ Total Weight _____ | | If Sacking, Based On <input type="checkbox"/> 125 pieces <input type="checkbox"/> 15 pounds <input type="checkbox"/> Both | |
| Postage Computation | Name and Address of Individual or Organization for Which Mailing Is Prepared (If other than permit holder) | | | | Name and Address of Mailing Agent (If other than permit holder) | | | |
| | Customer No. _____ (Dun & Bradstreet) | | | | Customer No. _____ (Dun & Bradstreet) | | | |
| | <input type="checkbox"/> For Regular automation rate letter-size (DMM C810) or flat-size pieces (see DMM C820) weighing .2068 lb. (3.3087 oz.) or less, go to Part A on reverse of this form. <input type="checkbox"/> For Regular nonautomation rate pieces (DMM C050) weighing .2068 lb. (3.3087 oz.) or less, go to Part B on reverse of this form. <input type="checkbox"/> For Enhanced Carrier Route rate pieces (DMM C050) weighing .2066 lb. (3.3062 oz.) or less, go to Part C on reverse of this form. <input type="checkbox"/> For Enhanced Carrier Route rate pieces weighing more than .2066 lb. (3.3062 oz.), or Regular rate pieces weighing more than .2068 lb. (3.3087 oz.) but all less than 1.0 lb. (16.0 oz.), go to Part D on reverse of this form. | | | | Postage (From reverse side) | | Part A | \$ |
| | | | | | | | Part B | \$ |
| | | | | | | | Part C | \$ |
| <input type="checkbox"/> Additional Postage Payment (State reasons) <input type="checkbox"/> Single-Piece Rate <input type="checkbox"/> Nonstandard Surcharge <input type="checkbox"/> Special Service (Specify) | | | | No. Pieces _____ Rate/Fee Per Pc. _____ x \$ _____ = \$ | | | | |
| Is applicable bulk per piece rate affixed to each piece? (Form 3602-PR required) <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | Total Postage | | \$ | | |
| Certification | <input type="checkbox"/> For Enclosed Reply Pieces (Automation rates only) (Effective 1/1/97): I certify that all business reply, courtesy reply, or metered reply letter-size cards or envelopes, enclosed in the pieces described above, bear the correct facing identification mark (FIM) and barcode under DMM C810. <input type="checkbox"/> For ZIP Codes (Nonautomation rates only): I certify that the ZIP Codes appearing on the pieces described above have been verified and corrected where necessary within 12 months of the date of this mailing using a USPS-approved method. | | | | | | | |
| | The signature of a mailer certifies that it will be liable for and agrees to pay, subject to appeals prescribed by postal laws and regulations, any revenue deficiencies assessed on this mailing. (If this form is signed by an agent, the agent certifies that it is authorized to sign this statement, that the certification binds the agent and the mailer, and that both the mailer and the agent will be liable for and agree to pay any deficiencies.) | | | | | | | |
| | The submission of a false, fictitious, or fraudulent statement may result in imprisonment of up to 5 years and a fine of up to \$10,000 (18 USC 1001). In addition, a civil penalty of up to \$5,000 and an additional assessment of twice the amount falsely claimed may be imposed (31 USC 3802). | | | | | | | |
| | I hereby certify that all information furnished on this form is accurate and truthful, that this mailing meets all applicable CASS/MASS standards for address and barcode accuracy, and that the material presented qualifies for the rates of postage claimed. | | | | | | | |
| | Signature of Permit Holder or Agent (Both principal and agent are liable for any postage deficiency incurred.) | | | | | | Telephone | |
| USPS Use Only | Single-Piece Weight _____ pounds | | Are figures at left adjusted from mailer's entries? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | |
| | Total Pieces _____ | Total Weight _____ | If "Yes," Reason _____ | | | | | |
| | Total Postage _____ | | | | | | | |
| | Check One <input type="checkbox"/> Presort Verification Not Scheduled <input type="checkbox"/> Presort Verification Performed as Scheduled | | Date Mailed Notified | Contact | By (Initials) | | Round Stamp (Required) | |
| | I CERTIFY that this mailing has been inspected concerning: (1) eligibility for postage rate claimed; (2) proper preparation (and presort where required); (3) proper completion of postage statement; and (4) payment of required annual fee. | | | | | | | |
| Signature of Weigher | | | | | | Time _____ AM _____ PM | | |


Form 3602-R — Standard Mail (A) (Other Than Nonprofit) — Permit Imprint

Postage Computation

| Entry Discount (If any) | Presort / Automation Discounts | Net Rate | Count (Pcs. / Lbs.) | Charge | Entry Discount (If any) | Presort / Automation Discounts | Net Rate | Count (Pcs. / Lbs.) | Charge |
|---|--------------------------------|----------|---------------------|--------|--|--------------------------------|----------|---------------------|--------|
| A Regular Automation Rates — Letters (DMM C810) and Flats (DMM C820) Weighing .2068 Lb. (3.3087 Oz.) or Less | | | | | B Regular Nonautomation Rates — Pieces Weighing .2068 Lb. (3.3087 Oz.) or Less | | | | |
| None | 5-Digit Letter | .155 x | pcs. = \$ | | None | 3/5 Letter | .209 x | pcs. = \$ | |
| | 3-Digit Letter | .175 x | pcs. = \$ | | | 3/5 Nonletter | .225 x | pcs. = \$ | |
| | Basic Letter | .183 x | pcs. = \$ | | | Basic Letter | .256 x | pcs. = \$ | |
| | 3/5 Flat | .189 x | pcs. = \$ | | | Basic Nonletter | .306 x | pcs. = \$ | |
| | Basic Flat | .277 x | pcs. = \$ | | DBMC | 3/5 Letter | .196 x | pcs. = \$ | |
| | | | | | | 3/5 Nonletter | .212 x | pcs. = \$ | |
| | | | | | | Basic Letter | .243 x | pcs. = \$ | |
| | | | | | | Basic Nonletter | .293 x | pcs. = \$ | |
| DBMC | 5-Digit Letter | .142 x | pcs. = \$ | | DSCF | 3/5 Letter | .191 x | pcs. = \$ | |
| | 3-Digit Letter | .162 x | pcs. = \$ | | | 3/5 Nonletter | .207 x | pcs. = \$ | |
| | Basic Letter | .170 x | pcs. = \$ | | | Basic Letter | .238 x | pcs. = \$ | |
| | 3/5 Flat | .176 x | pcs. = \$ | | | Basic Nonletter | .288 x | pcs. = \$ | |
| | Basic Flat | .264 x | pcs. = \$ | | | | | | |
| | | | | | | | | | |
| DSCF | 5-Digit Letter | .137 x | pcs. = \$ | | | | | | |
| | 3-Digit Letter | .157 x | pcs. = \$ | | | | | | |
| | Basic Letter | .165 x | pcs. = \$ | | | | | | |
| | 3/5 Flat | .171 x | pcs. = \$ | | | | | | |
| | Basic Flat | .259 x | pcs. = \$ | | | | | | |
| | | | | | | | | | |
| Total — Part A (Carry to front of form) \$ | | | | | Total — Part B (Carry to front of form) \$ | | | | |
| C Enhanced Carrier Route Rates — Pieces Weighing .2066 Lb. (3.3062 Oz.) or Less | | | | | D Check <input type="checkbox"/> Regular Rate Pieces Weighing More Than .2068 Lb. (3.3087 Oz.) but Less Than 1.0 Lb. (16.0 Oz.) One: <input type="checkbox"/> Enhanced Carrier Route Rate Pieces Weighing More Than .2066 Lb. (3.3062 Oz.) but Less Than 1.0 Lb. (16.0 Oz.) | | | | |
| None | Saturation Letter | .133 x | pcs. = \$ | | None | Saturation ECR | .000 x | pcs. = \$ | |
| | Saturation Nonletter | .137 x | pcs. = \$ | | | plus | .663 x | lbs. = \$ | |
| | High Density Letter | .142 x | pcs. = \$ | | | High Density ECR | .010 x | pcs. = \$ | |
| | Basic Automation Letter | .146 x | pcs. = \$ | | | plus | .663 x | lbs. = \$ | |
| | High Density Nonletter | .147 x | pcs. = \$ | | | Basic ECR | .018 x | pcs. = \$ | |
| | Basic Letter | .150 x | pcs. = \$ | | | plus | .663 x | lbs. = \$ | |
| | Basic Nonletter | .155 x | pcs. = \$ | | | 3/5 Automation* | .049 x | pcs. = \$ | |
| | | | | | | plus | .677 x | lbs. = \$ | |
| DBMC | Saturation Letter | .120 x | pcs. = \$ | | | 3/5 Nonautomation | .085 x | pcs. = \$ | |
| | Saturation Nonletter | .124 x | pcs. = \$ | | | plus | .677 x | lbs. = \$ | |
| | High Density Letter | .129 x | pcs. = \$ | | | Basic Automation* | .137 x | pcs. = \$ | |
| | Basic Automation Letter | .133 x | pcs. = \$ | | | plus | .677 x | lbs. = \$ | |
| | High Density Nonletter | .134 x | pcs. = \$ | | | Basic Nonautomation | .166 x | pcs. = \$ | |
| | Basic Letter | .137 x | pcs. = \$ | | | plus | .677 x | lbs. = \$ | |
| | Basic Nonletter | .142 x | pcs. = \$ | | DBMC | Saturation ECR | .000 x | pcs. = \$ | |
| | | | | | | plus | .599 x | lbs. = \$ | |
| DSCF | Saturation Letter | .115 x | pcs. = \$ | | | High Density ECR | .010 x | pcs. = \$ | |
| | Saturation Nonletter | .119 x | pcs. = \$ | | | plus | .599 x | lbs. = \$ | |
| | High Density Letter | .124 x | pcs. = \$ | | | Basic ECR | .018 x | pcs. = \$ | |
| | Basic Automation Letter | .128 x | pcs. = \$ | | | plus | .599 x | lbs. = \$ | |
| | High Density Nonletter | .129 x | pcs. = \$ | | | 3/5 Automation* | .049 x | pcs. = \$ | |
| | Basic Letter | .132 x | pcs. = \$ | | | plus | .613 x | lbs. = \$ | |
| | Basic Nonletter | .137 x | pcs. = \$ | | | 3/5 Nonautomation | .085 x | pcs. = \$ | |
| | | | | | | plus | .613 x | lbs. = \$ | |
| DDU | Saturation Letter | .110 x | pcs. = \$ | | | Basic Automation* | .137 x | pcs. = \$ | |
| | Saturation Nonletter | .114 x | pcs. = \$ | | | plus | .613 x | lbs. = \$ | |
| | High Density Letter | .119 x | pcs. = \$ | | | Basic Nonautomation | .166 x | pcs. = \$ | |
| | Basic Automation Letter | .123 x | pcs. = \$ | | | plus | .613 x | lbs. = \$ | |
| | High Density Nonletter | .124 x | pcs. = \$ | | DSCF | Saturation ECR | .000 x | pcs. = \$ | |
| | Basic Letter | .127 x | pcs. = \$ | | | plus | .578 x | lbs. = \$ | |
| | Basic Nonletter | .132 x | pcs. = \$ | | | High Density ECR | .010 x | pcs. = \$ | |
| | | | | | | plus | .578 x | lbs. = \$ | |
| | | | | | | Basic ECR | .018 x | pcs. = \$ | |
| | | | | | | plus | .578 x | lbs. = \$ | |
| | | | | | | 3/5 Automation* | .049 x | pcs. = \$ | |
| | | | | | | plus | .592 x | lbs. = \$ | |
| | | | | | | 3/5 Nonautomation | .085 x | pcs. = \$ | |
| | | | | | | plus | .592 x | lbs. = \$ | |
| | | | | | | Basic Automation* | .137 x | pcs. = \$ | |
| | | | | | | plus | .592 x | lbs. = \$ | |
| | | | | | | Basic Nonautomation | .166 x | pcs. = \$ | |
| | | | | | | plus | .592 x | lbs. = \$ | |
| | | | | | DDU | Saturation ECR | .000 x | pcs. = \$ | |
| | | | | | | plus | .552 x | lbs. = \$ | |
| | | | | | | High Density ECR | .010 x | pcs. = \$ | |
| | | | | | | plus | .552 x | lbs. = \$ | |
| | | | | | | Basic ECR | .018 x | pcs. = \$ | |
| | | | | | | plus | .552 x | lbs. = \$ | |
| Total — Part C (Carry to front of form) \$ | | | | | Total — Part D (Carry to front of form) \$ | | | | |

*Available only for automation-compatible flats (DMM C820)

Batch: B0000006

| | | | |
|--------------------------------------|---|---|---|
| [] Single List | | Coding Accuracy Support System (CASS) Report | |
| [X] Multiple Lists | | | |
| S O F T W A R E | CASS CERTIFICATE INFORMATION | | |
| | A1. | CASS CERTIFIED COMPANY NAME United States Postal Service | |
| | C | Software Name, Version, and Date of Certification | |
| | A | Address Matching System 01-Jan-1998 | |
| | S | Configuration STD | |
| L I S T | B1. LIST PROCESSOR U.S. Postal Service | B2. Date Processed 10/31/98 | B3. Date of Zip+4 Data 11/1/98 9-15-98 |
| | B4. ADDRESS LIST NAME CASS Stage II | B5. Number of Lists 1 | B6. Total Addresses 1 |
| O U T | CASS OUTPUT RATING | TOTAL CODED | PERCENT OF TOTAL ADDRESSES |
| P | C1. RECORDS ZIP+4 CODED | 1 | 100 |
| U | C2. RECORDS 5-DIGIT CODED | 1 | 100 |
| T | C3. RECORDS CR RT CODED | 1 | 100 |
| M A I L E R | D1. SIGNATURE OF MAILER  | | D2. NAME & ADDRESS OF MAILER Vestcom Massachussetts, Inc. 1 Gill Street Woburn, MA 01801 |
| | I certify that the mailing submitted with this form has been ZIP+4 coded (as indicated above) using CASS certified software meeting all requirements of Domestic Mail Manual A0950. | | D3. DATE SIGNED 11/5/98 |



USPS Qualification Report
Mailer Name: Mail Id: 0001 Date: 31-Oct-98
USPS-NETPOST
NETPOST

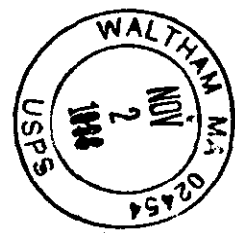
PRINTED 31-Oct-98 02:00:31pm

Entry point: (1) Local post office, WALTHAM, MA 02205
Presort: (2) 1C/STD_A, Single piece

| Tray # | Tray | Tray | Tray | Group | Pc/Ver | ID | Dest | CB | 5B | 3B | 3/5B | BB | BS | SP | Running Totals |
|--------|------|------|------|-------|--------|----|------|----|----|----|------|----|----|----|----------------|
| 1 | 1-U | SGL | | | | | | | | | | | | 1 | 1 |

Mailing Total

Mailing Rate Summary
Single piece Rate (SP) 1
Pieces



**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF PITNEY BOWES INC.**

PB/USPS-T1-4. What requirements or restrictions will be imposed on payment of MOL fees by:

- a. Prepaid account; or
- b. Other approved payment method (USPS-T1, 10 I. 10)?
 - i. To the extent of your answer to subpart a above describes a method different from that set out at 39 C.F.R. § 510.28(b), please explain any differences.

RESPONSE.

[Counsel for the Postal Service confirmed with counsel for Pitney Bowes that the reference in part (b) is to page 10, line 10 of USPS-T-1, and that the Code of Federal Regulations cite in subpart (i) is to section 501.28(b).]

PostOffice Online does not offer the use of prepaid accounts as a payment option. Development of additional payment methods is ongoing; when that process is complete any requirements or restrictions upon their usage will also be known.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
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PB/USPS-T1-5. Did the Postal Service consider contracting with a private service provider for verification of payments "via credit card, prepaid account, or other approved payment method" or any of those functions?

RESPONSE:

Yes, the Postal Service contracts with Bank of America (formerly NationsBank) for card processing.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY
TO INTERROGATORIES OF PITNEY BOWES INC.**

PB/USPS-T1-6. Is the Postal Service's AMS database to which you make reference in your response to MASA/USPS-T5-8 (c) (redirected to you) available online to would-be competitors with the MOL offering?

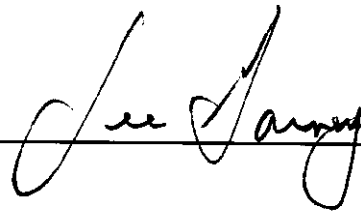
- a. If so, how is access obtained and what are the terms and conditions of access?
- b. If not, why not?

RESPONSE:

a. Yes, the national Postal Service ZIP+4 AIS product, which is the source of data used by the MOL address matching systems, is available from the USPS Address Information Customer Support office for a subscription fee of \$900 per year. The MOL system developers also used a Postal Service developed Application Program Interface (API) to create the matching system. The license fee for the Postal Service ZIP+4 API (which includes the DLL) and associated address matching database, which is updated 6 times per year, is available to individual customers for \$1190 per year. Vendors (those who intend to remarket and sell the API) pay an additional \$5000.00 per year.

DECLARATION

I, Lee Garvey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.




A handwritten signature in cursive script, reading "Lee Garvey", is written over a horizontal line.

Dated: 11/5/98

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Kenneth N. Hollies

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 5, 1998